

DOE ORDER # 94 RF 01175



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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC

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January 26, 1994

94-RF-01175

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OPERABLE UNIT NUMBER 2 (OU-2) OCCURRENCES - SGS-055-94

In response to your concerns about the reoccurring OU-2 occurrences, we are providing the following information

The OU-2 Field Treatability Unit (FTU) is being operated as an Interim Measure/Interim Remedial Action under the Interagency Agreement between Department of Energy, Environmental Protection Agency, and Colorado Department of Health. The FTU began collecting water from three surface water sources located in the South Walnut Creek basin on May 8, 1991. The system is designed to operate at sixty gallons per minute, 24-hours per day, 364 days per year. Heavy metals and radionuclides are removed in the chemical precipitation/microfiltration unit, and volatile organic compounds are adsorbed in granular activated carbon units. To date the facility has **treated over 20.7 million gallons of water**.

The original operations and maintenance subcontractor (Riedel Environmental Services) was replaced by Resource Technology Group, Inc (RTG) on May 1, 1993. A new EG&G project management team was also assigned to the project at this time. Standard Operating Procedures (SOPs), Conduct of Operations (COOP), and compliance with plant standards were nonexistent prior to the changeover, and were incorporated into the daily operations at the facility concurrent with the change of operations personnel.

While drafting SOPs and incorporating COOP into daily operations involved mostly paperwork, it also entailed installation of a new mindset resulting in a different way of doing business in order to bring the facility up to plant standards. This has been a long and tedious job. The OU-2 FTU was constructed and brought into full operations without performing an Operations Readiness Review, or without quality inspection by Facility Inspection. As a result of this, the facility was able to begin operating without complying to plant standards. The facility is now two and one-half years old and has treated a tremendous amount of water. Signs of aging are beginning to show, and while there is a preventative maintenance program in effect, equipment failures are continuing to plague the facility. Much of the equipment at the facility is inadequate for the job it must perform, and is slowly being replaced with equipment that is suitable for the job. Many improvements are still required to bring the facility into full compliance with the Rocky Flats Plant standards, and work is being performed to ensure that this is completed as soon as possible. The compliance commitments do not allow us to shut down the facility for an extended major overhaul or redesign.

The facility has submitted many occurrences to the Occurrence Notification Center. In the past, problems were not properly reported to the appropriate personnel. The new objective of the FTU includes 100% compliance with reporting requirements, meeting all appropriate plant

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and operating requirements, and improving the operations efficiency of the facility While more work and improvement are still required, the OU-2 FTU has seen substantial improvements in the last eight months The hard work and planning from Environmental Operations Management (EOM) personnel have greatly improved the facility

The operations and maintenance subcontractor RTG has been an invaluable asset to the project RTG has performed work above and beyond requirements associated with operating the facility RTG expedited the schedule to develop SOPs for the FTU, and was able to deliver them one month ahead of schedule Recently, RTG proposed a sludge reduction plan that was adopted in late December This plan is going to reduce the amount of low-level mixed waste produced at OU-2 by approximately ninety drums per year This waste reduction of approximately 50% will save roughly \$360,000 per year and will help reduce the waste storage problem at Rocky Flats via waste minimization This will be a several million dollar cost savings in the long run, as the OU-2 FTU is expected to be required to collect and treat its contaminated water until the sources are no longer determined to be an unacceptable risk to people and the environment RTG has also implemented several smaller changes to the facility which have reduced waste production and chemical use Operations personnel have contributed to successfully fine tune and operate the facility under intense scrutiny

All efforts are being made to reduce/eliminate any reportable occurrences, but due to the history of the project, problems will continue to arise in the near future Equipment is inspected each shift prior to operation to ensure that the equipment is operating properly and does not pose a safety hazard Once all of the equipment that is lagging in performance is upgraded and/or replaced, the FTU will achieve a level of operations that will allow for little, if any occurrences The subcontractor and EOM project management are highly trained personnel that are improving the operations of the facility on a daily basis

If you have any questions or concerns, please feel free to contact Ty Vess at extension 6540 or me at extension 8540



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